

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
CHINA FISHERY GROUP LIMITED (CAYMAN)	:	Case No. 16-11895 (JLG)
<i>et al.,</i>	:	
Debtors.¹	:	(Jointly Administered)

In re:	:	Chapter 11
	:	
CFG Peru Investments Pte. Limited (Singapore),	:	Case No. 16-11914 (JLG)
Debtor.	:	
	:	(Jointly Administered)

FIRST SUPPLEMENTAL AFFIDAVIT OF WILLIAM A. BRANDT, JR.

Pursuant to 28 U.S.C. § 1746, I, William A. Brandt, Jr., hereby declare as follows:

1. I am the Executive Chairman of Development Specialists, Inc. ("DSI"), a restructuring and financial advisory firm that specializes in interim management, turnaround consulting, operational due diligence, creditor advisory services, and financial and operational restructuring. DSI maintains offices at 110 E. 42nd Street, Suite 1818, New York, New York 10017.

¹ The Debtors are China Fishery Group Limited (Cayman) ("CFGL"), Pacific Andes International Holdings Limited (Bermuda) ("PAIH"), N.S. Hong Investment (BVI) Limited ("NS Hong"), South Pacific Shipping Agency Limited (BVI) ("SPSA"), China Fisheries International Limited (Samoa) ("CFIL"), CFGL (Singapore) Private Limited ("CFGLPL"), Chanery Investment Inc. (BVI) ("Chanery"), Champion Maritime Limited (BVI) ("Champion"), Growing Management Limited (BVI) ("Growing Management"), Target Shipping Limited (HK) ("Target Shipping"), Fortress Agents Limited (BVI) ("Fortress"), Ocean Expert International Limited (BVI) ("Ocean Expert"), Protein Trading Limited (Samoa) ("Protein Trading"), CFG Peru Investments Pte. Limited (Singapore) ("CFG Peru"), Smart Group Limited (Cayman) ("Smart Group"), Super Investment Limited (Cayman) ("Super Investment") and Pacific Andes Resources Development Ltd. ("PARD").

2. I hereby submit this affidavit and statement (the “First Supplemental Affidavit”) to supplement the disclosures set forth in my affidavit dated November 9, 2016 (the “Initial Affidavit”) [Docket No. 218],² in support of my appointment as Chapter 11 Trustee (the “Trustee” or the “Chapter 11 Trustee”) of CFG Peru Investments Pte. Limited (Singapore) (“CFG Peru”) in the above-captioned Chapter 11 Cases. Except as otherwise indicated herein, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.³

3. In connection with my proposed appointment as Trustee for the Debtors, both I and DSI reviewed our records (and our affiliates’), and on November 9, 2016, filed the Initial Affidavit disclosing identified connections with parties in interest in these Chapter 11 Cases. In accordance with the representations made in the Initial Affidavit, both I and DSI continue to conduct further periodic checks with respect to known and newly-identified persons and parties in interest in these Chapter 11 Cases.

4. Based on these periodic investigations, both I and DSI disclose that, in addition to the entities or individuals previously disclosed in the Initial Affidavit, either I or DSI have a connection with the following entities or their affiliates, in matters unrelated to the Debtors, these Chapter 11 Cases, or such entities’ claims against or interests in the Debtors:

(a) **Bryan Cave LLP.** Over the last ten years, DSI has had the following disclosable relationships with Bryan Cave LLP:

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Initial Declaration.

³ Certain of the disclosures herein relate to matters within the knowledge of other employees at DSI and are based on information provided by them.

(i) I am the liquidating agent for Citizens Central Bancorp, Inc. for which Bryan Cave LLP (“Bryan Cave”) acts as local counsel.

(ii) A member of DSI serves as the chapter 11 trustee of the Estate Financial Mortgage Fund, LLC, a bankruptcy proceeding in the Central District of California, that is prosecuting a malpractice claim against Bryan Cave.

(iii) DSI is the assignee in two assignments for the benefit of creditors – Farmlink, Inc. and Machinerylink Solutions Inc. for which Bryan Cave represents the assignors.

(iv) A member of DSI is the Chief Restructuring Officer of The Oaks at Stonecrest Apartments, LLC, a Delaware proceeding, where Bryan Cave represents the secured lender.

(v) A member of DSI previously served as Chief Restructuring Officer of HUSA Liquidating Corporation f/k/a HearUSA, Inc. and later served as the liquidating trustee of HUSA Liquidating Corporation Liquidating Trust, a bankruptcy proceeding in the Southern District of Florida, where Bryan Cave represented the CRO and liquidating trustee as special SEC counsel.

(b) **Klestadt Winters Jureller Southard & Stevens, LLP.** Over the last ten years, DSI has had the following disclosable relationships with Klestadt Winters Jureller Southard & Stevens, LLP:

(i) DSI is the financial advisor to the plan administrator for Dreier LLP, who is represented by Klestadt Winters Jureller Southard & Stevens, LLP (“Klestadt Winters”).

(ii) DSI is the plan administrator for Coudert Brothers where Klestadt Winters served as special counsel to DSI in its capacity as plan administrator.

(iii) DSI is the plan administrator for Binder & Binder – The National Social Security Disability Advocates (NY), LLC, et al. (“Binder & Binder”) where Klestadt & Winters served as counsel to the official committee of unsecured creditors.

5. **Lowenstein Sandler LLP.** I previously served as the Chief Restructuring Officer of Binder & Binder. In accordance with the plan of reorganization, the reorganized debtors have designated DSI, through me, as the plan administrator. Lowenstein Sandler LLP served as bankruptcy counsel to Binder & Binder and continues to provide counsel to the reorganized debtors.

6. **Skadden, Arps, Slate, Meagher & Flom.** Over the last ten years, DSI has had the following disclosable relationships with Skadden, Arps, Slate, Meagher & Flom (“Skadden, Arps”):

(a) DSI is the plan administrator for Coudert Brothers. Skadden, Arps represents Statek Corporation on claims against Coudert Brothers.

(b) Skadden, Arps represented DSI as assignee in connection with the assignment for the benefit of creditors by Network Physics, Inc.

7. **Weil, Gotshal & Manges LLP.** I serve as the Chief Restructuring Officer of Aéropostale, Inc. Weil, Gotshal & Manges LLP serves as bankruptcy counsel to Aéropostale, Inc.

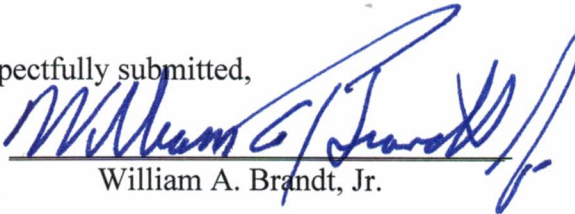
8. Both I and DSI will continue to conduct due diligence and will file additional supplemental declarations to the extent necessary.

I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge, information, and belief, and after reasonable inquiry, the foregoing is true and correct.

Dated: March 10, 2017
New York, New York

Respectfully submitted,

By:


William A. Brandt, Jr.